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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSEPH
MARCHICA, KEVIN MCMILLAN,
ZINOVIA SPEZAKIS and NEW
JERSEY WORKING FAMILIES
ALLIANCE, INC.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
official capacity as Ocean County Clerk,
PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk,
JOHN S. HOGAN, in his official capacity
as Bergen County Clerk, EDWARD P.
MCGETTIGAN, in his official capacity as
Atlantic County Clerk and E. JUNIOR
MALDONADO, in his official capacity as
Hudson County Clerk,

Defendants.

Case No. 3:20-cv-08267-FLW-TJB

**NOTICE OF MOTION OF
DEFENDANT JOHN S. HOGAN, IN
HIS OFFICIAL CAPACITY AS
BERGEN COUNTY CLERK, TO
DISMISS PLAINTIFFS'
COMPLAINT IN ITS ENTIRETY,
WITH PREJUDICE**

TO COUNSEL:

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Attorneys for State of New Jersey

PLEASE TAKE NOTICE that on a date and time to be set by this Court, Kaufman Semeraro & Leibman, L.L.P., attorneys for Defendant John S. Hogan, in his official capacity as Bergen County Clerk (hereinafter, the “Bergen County Clerk”), shall move before the Honorable Chief Judge Freda L. Wolfson in the United States District Court for the District of New Jersey, Trenton Vicinage, at Court Room 5E, Clarkson S. Fischer Building & United States Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order dismissing Plaintiffs’ Complaint as to Clerk Hogan, pursuant to both Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6) and Local Rule 12.1 and for other reasons as may be presented in Motions to Dismiss filed by Co-Defendants in this action. This Motion to Dismiss is made on the grounds that Plaintiffs’ First Amended Complaint cannot state a cause of action as to the Bergen County Clerk, and that Plaintiffs’ First Amended Complaint should be dismissed for those reasons presented in Motions to Dismiss filed by Co-Defendants in this action and that the Bergen County Clerk is entitled to dismissal of all claims in Plaintiffs’ Complaint, with prejudice.

PLEASE TAKE FURTHER NOTICE that this Motion will be based on this Notice of Motion and the Brief submitted in support hereof and those pleadings filed

in support of the Motions to Dismiss filed by Co-Defendants in this action, the records and file herein and on such evidence as may be presented at the hearing of this Motion. A proposed form of Order is included with this Notice of Motion.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

DATED: March 29, 2021

/S/ Jaime R. Placek

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official capacity as Bergen County Clerk*